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Objection Deadline: October 3, 2008

ROBINSON & COLE LLP

885 Third Avenue

28<sup>th</sup> Floor

New York, New York 10022 Telephone: (212) 451-2900

Facsimile: (212) 451-2999 Email: cmajor@rc.com

Joseph L. Clasen, Esq. (JC 1759)

Christopher J. Major, Esq. (CM 7218)

Attorneys for Clayton Fixed Income Services, Inc.

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re		
LEHMAN BROTHERS HOLDING INC., et al.,	:	CHAPTER 11 Case No. 08-13555 (JMP)
Debtors.	; ; ;	(Jointly Administered)

OBJECTION OF CLAYTON FIXED INCOME SERVICES, INC. TO
DEBTORS' PROPOSED CURE AMOUNT PURSUANT TO THE ORDER
UNDER 11 U.S.C. §§ 105(a), 363, AND 365 AND FEDERAL RULES OF
BANKRUPTCY PROCEDURE 2002, 6004 AND 6006 AUTHORIZING AND
APPROVING (A) THE SALE OF PURCHASED ASSETS FREE AND CLEAR OF LIENS
AND OTHER INTERESTS AND (B) THE ASSUMPTION AND ASSIGNMENT OF
EXECUTORY CONTRACTS AND UNEXPIRED LEASES

Clayton Fixed Income Services, Inc. ("Clayton"), by its undersigned counsel, Robinson & Cole LLP, hereby submits its objection (the "Objection") in accordance with the Court's September 19, 2008 Order Under 11 U.S.C. §§ 105(a), 363, and 365 and Federal Rules of Bankruptcy Procedure 2002, 6004 and 6006 Authorizing and Approving (A) the Sale of Purchased Assets Free and Clear of Liens and Other Interests and (B) the Assumption and Assignment of Executory Contracts and Unexpired Leases (the "Sale Order), to the cure amount listed on the List of Non-IT Closing Date Contracts, which appears online at http://chapter 11.epiqsystems.com/Lehman (the "Assumed and Assigned Contract List").

#### **BACKGROUND**

- 1. Clayton provided credit risk management consulting services to Lehman Brothers Holdings, Inc. ("LBHI") and Lehman Brothers, Inc. ("LBI") pursuant to a contract (the "Clayton Contract"). The Clayton Contract was memorialized as follows: On or about January 28, 2004, Clayton, then known as The Murrayhill Company, and LBHI entered into that certain Master Consulting Agreement. In addition, on or about September 23, 1999, Clayton, then known as The Murrayhill Company, entered into a letter agreement with LBI.
- 2. On September 15, 2008 and September 16, 2008, respectively, Lehman Brothers Holdings Inc. ("LBHI") and LB 745 LLC ("LB 745") filed petitions for relief under Chapter 11, Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the "Bankruptcy Code") with the United States Bankruptcy Court for the Southern District of New York. The Debtors continue to manage and operate their businesses as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 3. On September 19, 2008, the Securities Investor Protection Corporation commenced an action under the Securities Investor Protection Act of 1970 in the United States District Court for the Southern District of New York (the "SIPA Action") against LBI, a wholly owned subsidiary of LBHI. The SIPA Action was subsequently transferred to the Bankruptcy Court.
- 4. On September 19, 2008, the Bankruptcy Court entered the Sale Order, which, among other things, approved the sale of certain assets to Barclays Capital Inc. ("Barclays"), including certain contracts designated for assumption and assignment at the closing of the sale (the "Closing Date Contracts"). The Sale Order further provided for any creditor that is a party

to a Closing Date Contract to object to the proposed cure amount stated in the Assumed and Assigned Contract List on or before October 3, 2008.

#### **OBJECTION TO CURE AMOUNT**

- 5. Pursuant to Section 365 of the Bankruptcy Code, a debtor-in-possession which seeks to assume and assign an executory contract must: (a) cure, or provide adequate assurance that it will promptly cure, any defaults under the executory contract; (b) compensate the counterparty to the executory contract for any actual pecuniary loss to such party resulting from such defaults; and (c) provide adequate assurance of future performance under the assumed and assigned contract. See 11 U.S.C. § 365(b)(1) and (f)(2).
- 6. The Debtors have assumed and assigned the Clayton Contract. In the Assumed and Assigned Contract List, updated as of October 1, 2008, the cure amount for the Clayton contract is listed as \$240,593.94. However, the actual cure amount should be \$478,901.79. The unpaid invoices supporting the revised cure amount are annexed hereto as Exhibit A. Therefore, Clayton objects to the proposed cure amount. In addition, Clayton objects to any undue delay in the payment of the cure amount.

#### **CONTACT INFORMATION**

7. For purposes of resolving this Objection, Clayton requests that parties contact the following persons:

Christopher J. Major, Esq. Robinson & Cole LLP

Telephone: (212) 451-2900

Facsimile: (212) 451-2999

Email: cmajor@rc.com

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#### **RESERVATION OF RIGHTS**

8. Clayton reserves its right to object to any attempt by the Debtors to assume and assign only a part or parts of the Clayton Contract or any attempt by the Debtors, Barclays, and/or another purchaser of the Debtors' assets to cure only certain defaults existing under the Clayton Contract. Clayton also reserves its right to object to any failure by the Debtors, Barclays, and/or another purchaser of the Debtors' assets to provide Clayton with adequate assurance of payment for Clayton's past, present, or future performance. Furthermore, Clayton reserves all of its rights under Section 365 of the Bankruptcy Code or other applicable laws and rules. Clayton reserves its rights to amend or supplement this objection, to introduce evidence supporting this Objection, and to present arguments and/or evidence at a hearing on the Objection.

#### CONCLUSION

WHEREFORE, Clayton respectfully requests that the Court enter an Order directing Debtors and/or Barclays to: (1) immediately pay Clayton the total cure amount of \$478,901.79; (2) provide Clayton with adequate assurance of payment for all past, present, and future services rendered by Clayton, whether or not invoiced as of the date hereof; and (3) granting such other and further relief as the Bankruptcy Court deems just and proper.

Dated: October 3, 2008 New York, New York

> ROBINSON & COLE LLP Attorneys for Clayton Fixed Income Services, Inc.

By: /s/ Christopher J. Major Joseph L. Clasen (JC 1759)

Christopher J. Major (CM 7218)

885 Third Avenue

28<sup>th</sup> Floor

New York, New York

Telephone: (212) 451-2900 Facsimile: (212) 451-2999

Email: cmajor@rc.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 3<sup>rd</sup> day of October, 2008, I caused a copy of the foregoing to be filed and served via the Court's ECF System on all parties receiving such notice and as indicated below:

#### VIA E-MAIL

Andy Velez-Rivera, Esquire
Paul Schwartzberg, Esquire
Brian Shoichi Masumoto, Esquire
Linda Riffkin, Esquire
Tracy Hope Davis, Esquire
The Office of the United States Trustee
33 Whitehall Street
21<sup>st</sup> Floor
New York, NY 10004
(U.S. Trustee)
E-mail: andy.velezriver@usdoi.gov

E-mail: andy.velezriver@usdoj.gov paul.schwartzberg@usdoj.gov brian.masumoto@usdoj.gov linda.riffkin@usdoj.gov tracy.hopedavis@usdoj.gov

### VIA E-MAIL

Richard P. Krasnow, Esquire Lori R. Fife, Esquire Shai Y. Waisman, Esquire Jacqueline Marcus, Esquire Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 (Counsel to Debtors)

E-mail: richard.krasnow@weil.com lori.fife@weil.com shai.waisman@weil.com jacqueline.marcus@weil.com

#### VIA E-MAIL

# **VIA E-MAIL**

Dennis F. Dunne, Esquire
Dennis O'Donnell, Esquire
Evan Fleck, Esquire
Milbank Tweed Hadley & McCloy LLP
1 Chase Manhattan Plaza
New York, NY 10005
(Counsel of Official Committee of
Unsecured Creditors)
E-mail: DDunne@milbank.com

E-mail: DDunne@milbank.com
DODonnell@milbank.com
EFleck@milbank.com

/s/ Christopher J. Major Christopher J. Major (CM 7218) **EXHIBIT A** 

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000019622

Invoice Date:

6/24/2008

Mark Hittner
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

#### CREDIT RISK MANAGEMENT - WHOLE LOAN PORT

February 2008 - \$33,468,350.21	306.79
March 2008 - \$31,540,375.67	289.12
April 2008 - \$29,895,486.73	274.04
ADJUSTMENT - AUGUST, SEPTEMBER, OCTOBER 2007	(146.63)
ADJUSTMENT - NOVEMBER, DECEMBER 2007, JANUARY 2008	(247.90)

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Invoice

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000021541

Invoice Date:

7/25/2008

Mark Hittner
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

CREDIT RISK MANAGEMENT SERVICES - 2nd Qtr 2008 (April, May, June) SASCO 2007-RNP1

April 08 - \$831,755,537.95 x 1.25bps/12

8,664.12

May 08 - \$816,438,903.99 x 1.25bps/12

8,504.57

June 08 - \$800,185,375.06 x 1.25bps /12

8,335.26

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000021545

Invoice Date:

7/25/2008

Michael Hitzmann & Khalil Kanaan Lehman Brothers, Inc. c/o Image Processing Systems Lehman Brothers Accounts Payable Dept. PO Box 2339 Secaucus, NJ 07096 USA

2nd Quarter 2008 (April, May, June) Credit Risk Manager Fee See 2008 Lehman LXS Details.xls for Monthly Charges

LXS 2006-17	16,023.18
LXS 2006-19	10,693.57
LXS 2006-20	9,389.70
LXS 2007-1	12,417.19
LXS 2007-3	18,173.10
LXS 2006-16N	29,002.44
LXS 2006-18N	13,529.34
LXS 2007-2N	18,878.48
LXS 2007-4N	30,778.33
LXS 2007-5H	12,735.44
LXS 2007-6	24,142.27
INDX 2006-AR14	14,691.53

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Invoice

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022199

Invoice Date:

8/22/2008

Ellen Kienan
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secancus, NJ 07096 USA

CREDIT RISK MANAGEMENT SERVICES - JULY 2008

SASCO 2002-RM1 Loans in Pool - 332 x \$5 = \$1,660.00 Base Fee = \$1,000.00

2,660.00

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Invoice

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022200

Invoice Date:

8/22/2008

Ellen Kienan
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

JULY 2008 BOND REPORTING FEE

LSSCO 99-2

1,500.00

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Invoice

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022886

Invoice Date:

9/25/2008

Ellen Kienan
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

CREDIT RISK MANAGEMENT SERVICES - AUGUST
SASCO 2002-RM1 LOANS IN POOL - 332 x \$5 = \$1,660.00 Base Fee = \$1,000.00

2,660.00

TOTAL

2,660.00

Please remit payment to:

JP Morgan Chase Bank SWIFT: CHASUS33

ABA/Routing number: 021000021 Account number: 114778965

For the account of Clayton Fixed Income Services

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Invoice

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022888

Invoice Date:

9/25/2008

Ellen Kienan
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

AUGUST 2008 BOND REPORTING FEE

LSSCO 99-2

1,500.00

TOTAL

1,500.00

Please remit payment to:

JP Morgan Chase Bank
SWIFT: CHASUS33
ABA/Routing number: 021000021
Account number: 114778965

For the account of Clayton Fixed Income Services

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# Invoice

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022889

Invoice Date:

9/25/2008

Mark Hittner
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

#### CREDIT RISK MANAGEMENT - WHOLE LOAN PORT

MAY 2008 - \$28,994,111.77 June 2008 - \$27,896,527.13 July 2008 - \$27,168,813.38 265.78 255.72

249.05

TOTAL

770.55

Please remit payment to:

JP Morgan Chase Bank SWIFT: CHASUS33 ABA/Routing number: 021000021

Account number: 114778965

For the account of Clayton Fixed Income Services

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022916

Invoice Date:

9/30/2008

Mark Hittner
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

CREDIT RISK MANAGEMENT SERVICES - 3rd Qtr 2008 (July, August, September) SASCO 2007 RNP1

July 08 - \$782,481,811.44 x 1.25bps/12	8,150.85
August 08 - \$763,145,428.11 x 1.25bps/12	7,949.43
September 08 - \$738,995,010.99 x 1.25bps/12	
For Period of 09/01/08 to 09/15/08	3,848.93
For Period of 09/16/08 to 09/19/08	1,026.38
For Period of 09/20/08 to 09/30/08	2,822.55

TOTAL

23,798.14

Please remit payment to:

JP Morgan Chase Bank SWIFT: CHASUS33 ABA/Routing number: 021000021 Account number: 114778965

For the account of Clayton Fixed Income Services

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022917

Invoice Date:

9/30/2008

Michael Hitzmann & Khalil Kanaan Lehman Brothers, Inc. c/o Image Processing Systems Lehman Brothers Accounts Payable Dept. PO Box 2339 Secaucus, NJ 07096 USA

3rd Quarter 2008 (July, August, September) Credit Risk Manager Fee See 2008 Lehman LXS Details.xis for Monthly Charges

LXS 2006-17		15,224.35
LXS 2006-19		10,048.58
LXS 2006-20		8,872.30
LXS 2007-1		11,875.26
LXS 2007-3		17,374.19
LXS 2006-16N		28,397.06
LXS 2006-18N	4	13,317.91
LXS 2007-2N		18,587.02
LXS 2007-4N		30,439.47
LXS 2007-5H		12,292.96
LXS 2007-6		23,213.73
INDX 2006-AR14		14,495.33
		•

TOTAL

204,138.16

Please remit payment to:

JP Morgan Chase Bank SWIFT: CHASUS33

ABA/Routing number: 021000021 Account number: 114778965

For the account of Clayton Fixed Income Services

Lehman Brothers, Inc Credit Risk Management Services July, August, September 2008

Deal	Period	Balance	Rate	Fee
LXS 2006-17	July	950,019,666.53	•	5,145.94
	August	936,532,766.40		5,072.89
	September - 9/1 to 9/15	924,095,404.86	0.65 bps	2,502.76
	September - 9/16 to 9/19	924,095,404.86	0.65 bps	667.40
	September - 9/20 to 9/30	924,095,404.86	0.65 bps	1,835,36
	•			15,224.35
		•		
LXS 2006-19	July	632,782,441.74	0.65 bps	3,427.57
· ·	August	617,813,461.36	0.65 bps	3,346.49
	September - 9/1 to 9/15	604,526,024.86	0.65 bps	1,637.26
	September - 9/16 to 9/19	604,526,024.86	0.65 bps	436.60
	September - 9/20 to 9/30	604,526,024.86	0.65 bps	1,200.66
	•			10,048.58
LXS 2006-20	July	556,139,775.45	0.65 bps	3,012.42
	August	547,149,906.90	0.65 bps	2,963.73
	September - 9/1 to 9/15	534,673,123.21	0.65 bps	1,448.07
	September - 9/16 to 9/19	534,673,123.21	0,65 bps	386.15
	September - 9/20 to 9/30	534,673,123.21	0.65 bps	1,061.92
		• •	•	8,872.29
				•
LXS 2007-1	July	743,999,397.15	0.65 bps	4,030.00
	August	731,573,791.30	0.65 bps	3,962.69
	September - 9/1 to 9/15	716,782,510.45	0.65 bps	1,941.29
	September - 9/16 to 9/19	716,782,610.45	•	517.68
	September - 9/20 to 9/30-	716,782,510.45		1,423.61
	ospiemos. Traditions			11,875.27
				-
LXS 2007-3	July	1,087,803,313.56	0.65 bps	5,892.27
	August	1,068,379,098.39	0.65 bps	5,787.05
	September - 9/1 to 9/15	1,051,360,140.87	•	2,847.43
	September - 9/16 to 9/19	1,051,360,140.87	-	759.32
	September - 9/20 to 9/30	1,051,360,140.87		2,088.12
		.,,,	****	17,374.19
				·
LXS 2006-16	vluL#	1,760,086,580.00	0.65 bps	9,533.80
	August	1,750,708,956.81		9,483.01
	September - 9/1 to 9/15	1,731,738,318.55		4,690.12
	September - 9/16 to 9/19	1,731,738,318.55		1,250.70
	September - 9/20 to 9/30	1,731,738,318.55		3,439.42
		·y· - ·y· maja - aras		28,397.05
				•
LXS 2006-18	Nuly	825,107,884.74	0.65 bps	4,469.33
	August	819,660,849.97		4,439.83
	<b>-</b>	• • •	•	

	September - 9/1 to 9/15 September - 9/16 to 9/19 September - 9/20 to 9/30	813,922,188.14 813,922,188.14 813,922,188.14	0.65 bps	2,204.37 587.83 1,616.54 13,317.90
LXS 2007-2N	July August September - 9/1 to 9/15 September - 9/16 to 9/19 September - 9/20 to 9/30	1,148,377,880.04 1,144,193,565.02 1,138,878,304.98 1,138,878,304.98 1,138,878,304.98	0.65 bps 0.65 bps 0.65 bps	6,220.38 6,197.72 3,084.46 822.52 2,261.94 18,587.02
LXS 2007-4N	July August September - 9/1 to 9/15 September - 9/16 to 9/19 September - 9/20 to 9/30	1,884,899,032.58 1,871,936,451.21 1,862,757,401.73 1,862,757,401.73 1,862,757,401.73	0.65 bps 0.65 bps 0.65 bps 0.65 bps 0.65 bps	10,209.87 10,139.66 5,044.97 1,345.32 3,699.64 30,439.46
LXS 2007-5H	July August September - 9/1 to 9/15 September - 9/16 to 9/19 September - 9/20 to 9/30	768,330,192.64 758,356,402.45 742,784,136.03 742,784,136.03 742,784,136.03	0.65 bps 0.65 bps 0.65 bps	4,161.79 4,107.76 2,011.71 536.46 1,475.25 12,292.97
LXS 2007-6	July August September - 9/1 to 9/15 September - 9/16 to 9/19 September - 9/20 to 9/30	1,452,723,397.24 1,426,600,707.21 1,406,287,577.94 1,406,287,577.94 1,406,287,577.94	0.65 bps 0.65 bps 0.65 bps	7,868.92 7,727.42 3,808.70 1,015.65 2,793.04 23,213.73
INDX 2006-A	F July August September - 9/1 to 9/15 September - 9/16 to 9/19 September - 9/20 to 9/30	899,842,257.53 891,274,110.26 884,944,640.34 884,944,640.34 884,944,640.34	0.65 bps 0.65 bps 0.65 bps	4,874.15 4,827.73 2,396.73 639.13 1,757.60 14,495.34

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022918

Invoice Date:

9/30/2008

Ellen Kienan
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

# SEPTEMBER 2008 BOND REPORTING FEE LSSCO 99-2

For Period of 09/01/08 to 09/15/08	750.00
For Period of 09/16/08 to 09/19/08	200.00
For Period of 09/20/08 to 09/30/08	550.00

TOTAL

1,500.00

Please remit payment to:

JP Morgan Chase Bank SWIFT: CHASUS33 ABA/Routing number: 021000021 Account number: 114778965 For the account of Clayton Fixed Income Services

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022919

Invoice Date:

9/30/2008

Ellen Kienan
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept.
PO Box 2339
Secaucus, NJ 07096 USA

#### LOSS MITIGATION FEE SASCO 98-8

July 08 - 92 - 43 x 9.5	465.50
August 08 - 86 - 43 x 9.5	408.50
September 08 - 85 - 39 x 9.5	·
For Period of 09/01/08 to 09/15/08	218.50
For Period of 09/16/08 to 09/19/08	58.27
For Period of 09/20/08 to 09/30/08	160.23

TOTAL

1,311.00

Please remit payment to:

JP Morgan Chase Bank SWIFT: CHASUS33

ABA/Routing number: 021000021 Account number: 114778965

For the account of Clayton Fixed Income Services

Clayton Fixed Income Services 1700 Lincoln, Suite 1600 Denver, CO 80203

Invoice Number:

0000022920

Invoice Date:

9/30/2008

Ellen Kienan
Lehman Brothers, Inc.
c/o Image Processing Systems
Lehman Brothers Accounts Payable Dept,
PO Box 2339
Secaucus, NJ 07096 USA

CREDIT RISK MANAGEMENT SERVICES - SEPTEMBER 2008

SASCO 2002- RM1 LOANS IN POOL - 326 x \$5 = \$1,630.00 Base Fee = \$1000.00

For Period of 09/01/08 to 09/15/08	
For Period of 09/16/08 to 09/19/08	
For Period of 09/20/08 to 09/30/08	•

TOTAL

2,630.00

1,315.00 350.67 964.33

Please remit payment to:

JP Morgan Chase Bank SWIFT: CHASUS33 ABA/Routing number: 021000021 Account number: 114778965 For the account of Clayton Fixed Income Services